

16 March 2009

Management Plan Review ATTEN. Mr. Jefferson Gray Thunder Bay National Marine Sanctuary 500 West Fletcher Street Alpena MI 49707

Dear Mr. Gray:

Thank you for providing us with the opportunity to comment on the "Thunder Bay National Marine Sanctuary's Draft Management Plan." The draft plan is carefully considered and addresses a variety of issues important not only to the sanctuary, but to the long term preservation and conservation of the Great Lakes. The plans clear incorporation of an integrated resource management perspective and the identified goal and objectives associated with that perspective are most timely. We also want to applaud the sanctuaries on-going and planned Public Outreach activities. These types of activities are critical to the success of the sanctuary, the protection of the lakes, and for creating opportunities for residents of all ages to appreciate, understand, and become involved in the preservation of their lakes.

If you have any questions, or if you need additional information, please feel free to contact us.

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John H. Broihahn State Archaeologist

State Archaeology and Maritime Preservation

John.broihahn@wisconsinhistory.org

608-264-6496

PUBLIC HEARING COMMENTS

Thunder Bay National Marine Sanctuary and Underwater Preserve Revised Management Plan Michigan Historical Center, Lansing March 20, 2009

Good afternoon and thank you for the opportunity to comment on the revised management plan. My name is Ken Vrana, and I am representing Archaeology & Maritime Heritage International (a Michigan limited liability company) and Maritime Heritage Consulting. I have 30 years of professional experience as a specialist in the management of historic shipwrecks and as an underwater archaeologist focusing on survey and assessment of underwater cultural heritage. As a long-time resident of Michigan and an alumnus of Michigan State University, I have constantly worked toward greater involvement of Michigan research and educational organizations in our Great Lakes and maritime heritage.

In addition, I have a unique, long-term perspective on Thunder Bay as a former underwater preserve specialist with the Michigan Sea Grant College Program and as managing editor of the draft EIS/MP for the Sanctuary/Preserve, and a contributor to the final EIS/MP. I have previously submitted comments regarding the Sanctuary/Preserve for its five-year review and at a scoping meeting for this plan in 2006. These comments were submitted on behalf of the Center for Maritime & Underwater Resource Management (CMURM), a Michigan nonprofit scientific and educational organization.

In general, I am excited about the community and economic development opportunities that the Sanctuary/Preserve has brought to northeast Michigan. In a way, the revised management plan is testimony to all the hard work and hopes of Michigan stakeholders since the 1970s. I was also pleased to see an outcomes-based approach to the plan, which can help make Sanctuary/Preserve programs more transparent and accountable to the public.

However, as a Michigan entrepreneur, small businessperson, and advocate for the growth of Michigan's knowledge economy (as contrasted with its manufacturing sector), I still have serious concerns regarding the perceived lack of substantive outreach to and involvement of Michigan organizations in research programs and projects at the Sanctuary/Preserve. The same may be true for educational programs and projects, but I do not have enough information to form a solid opinion. Why is this a serious concern -- we should not forget that the underwater cultural heritage and submerged lands of the Sanctuary/Preserve represent an important part of Michigan's maritime heritage, and are still owned by the citizens of Michigan under a public trust, with the expectation that our state agencies will wisely manage these resources in accordance with state laws and the Public Trust Doctrine. In essence, the citizens of Michigan are devoting important heritage assets to this unique state-federal management partnership, and therefore, have an important stake in its future.

It would be very beneficial to those assessing the revised management plan, therefore, that NOAA prepare and distribute a breakdown of funding provided by all federal programs to various grantees and contractors since 2000. This would answer the important question of "how

much of these funds are contributing to capacity-building within Michigan versus being 'out-sourced' to NOAA's east coast partners. In addition, it would be important to have available the results of a professional economic impact assessment conducted by an independent firm to ascertain the current and prospective monetary benefits of the Sanctuary/Preserve. Together, this information is crucial to better understanding the "return of investment" from public taxpayer dollars previously spent at the Sanctuary/Preserve, and currently being requested under the revised management plan. Frankly, I am surprised that this information has not been provided as part of the 2006 scoping meetings (and the revised management plan process), because such an approach is common practice in modern strategic and business planning.

As an example of my concerns, I find it curious that Research Strategy R-4 states that NOAA will "Develop partnerships with local, national and international researchers and organizations to enhance sanctuary research programs," but leaves out "state" researchers and organizations. Also, under Strategy R-5 -- Activity 5.2 (A) states that the Sanctuary/Preserve will "Work with ONMS headquarters and the NOAA Maritime Heritage Program to establish memorandums of agreement with appropriate institutions." How will "appropriate" be defined? Considering the fact that most student research opportunities seem to be going to east coast universities, and that the current director of the NOAA Maritime Heritage Program is the past chairperson of one of those universities, how can we assure that Michigan universities, colleges, and other institutions are going to get at least equal opportunity and access to such internships and fellowships.

I have a couple recommendations in that regard: First, the revised management plan should state, where appropriate, that the Sanctuary/Preserve will prepare a "Michigan partnership plan" in collaboration with responsible state agencies that includes strategies to aggressively promote, facilitate, and recruit the involvement of Michigan universities, colleges, and other institutions in all programs and projects of the Sanctuary/Preserve. The partnership plan should also include strategies for state-wide advertisement of competitive bids, requests for proposals, and other contract and grant procedures that assure that Michigan organizations are (1) well-informed about research and educational opportunities at the Sanctuary/Preserve, (2) given such information in a timely manner, and therefore, (3) have at least equal opportunity in submitting bids and proposals. The research and technology development programs are of particular importance to Michigan organizations in the current economic downturn, and as we transition from a primarily manufacturing economy to more of a knowledge economy. Second, the joint management committee should include two individuals representing Michigan and one individual representing NOAA. As for the Michigan representatives, one individual should be familiar with state resource management policies, and another familiar with research and educational policies in Michigan.

My other preliminary comments are as follows:

(1) The United States (and nearly all major maritime nations) are *not* signatories to the *UNESCO Convention on the Protection of the Underwater Cultural Heritage*. One of the reasons given for slow endorsement of this Convention is that it did not adequately involve a broad representation of stakeholders in the underwater cultural heritage. Frankly, however, I am not too concerned about the Annex Rules because they represent an attempt to leverage adherence to more professional research planning. However, to be effective, everyone (including NOAA and state

agencies) should abide by Annex Rules regarding the preparation of professional, strategic research plans and project research designs. That brings up a question — can I receive a copy of the Sanctuary/Preserve's current strategic research plan, and copies of a few project research designs for review and comment?

(2) The Sanctuary/Preserve needs to develop substantive working relationships with professional researchers in human dimensions and the applied social sciences to better assess and develop its programs, and to prepare effective strategic plans for these programs (including integrated approaches to marketing and community engagement). As soon as possible, therefore, the Sanctuary/Preserve should add staff with academic qualifications and experience in community development, and recreation and tourism management to improve its capacities in these important professional fields, and to better develop collaborative relationships with Michigan user groups and other stakeholders.

In closing, I will submit additional comments on the revised management plan on behalf of the Center for Maritime & Underwater Resource Management (CMURM) by the April 10 deadline.

Thank you again for the opportunity to comment.

Ken Vrana
President, Archaeology & Maritime Heritage International, LLC
Principal, Maritime Heritage Consulting
4272 S. Shepardsville Rd.
St. Johns, MI 48848
989-834-0007
vranaken@earthlink.net

From jimd <jimd@lhi.net>

Sent Monday, March 23, 2009 12:49 pm

To Tera.Panknin@noaa.gov

Subject Re: Comments on the Sanctuary's Draft Management Plan

The Thunder Bay National Marine Sanctuary Draft Management Plan is a well thought out, and artistically laid out document. It has involved a tremendous amount of work and input to make it into the concise presentation of the important continuing plans, projects and new ideas of the sanctuary, and gives realistic plans for implementation and budgeting. All presented in a pleasing presentation that is easy to understand. It covers a lot of ground (*or water*) in a very compact but thorough document.

Most people I talk to about the Sanctuary are very impressed with it and its work, whether historical, or educational. And all are aware of the economic benefit to the area.

This plan can only improve on what we have now, and provide the public (all age groups) more knowledge of the Thunder Bay area's role in the history of the great lakes region in the past, present and future.

James Dessenberg

Alternate Citizen at Large

Sanctuary Advisory Committee

-----Original Message-----

From: Tera.Panknin@noaa.gov Date: 3/13/2009 8:47:35 AM To: undisclosed-recipients:,

Subject: Comments on the Sanctuary's Draft Management Plan

Dear SAC Members:

As SAC Chair, I would like to encourage all SAC members to submit comments on the sanctuary's Draft Management Plan. Comments can be sent to the Great Lakes Maritime Heritage Center, 500 W. Fletcher Street, Alpena, MI 49707, by fax to 989-354-0144, or by email to Tera by replying to this message. This is an opportunity for us to show our support for the sanctuary. Thank you for your time.

Sincerely,

Steve Kroll, Chair

Thunder Bay Sanctuary Advisory Council

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PREPARED STATEMENT OF THE DRAFT MANAGEMENT PLAN Public Hearing, Alpena, Michigan March 24, 2009

I am Dennis Bodem from Alpena, Michigan, currently serving as an Alternate member of the Thunder Bay Sanctuary Advisory Council. The following statement is based upon my more than forty-one year career in various administrative positions in archives, museums, historical societies, and libraries at the state and regional levels in Wisconsin, New York and Michigan.

The proposed Draft Management Plan is lucid, and succinct. Each statement is the distillation of many hundreds of hours of deliberation by volunteer and staff members of different study committees.

Each of the "Action Plans" (Resources Protection, Education and Outreach Research, Sanctuary Operations and Administration) is realistic and "do-able." Simply, each of the proposed "action plans" will succeed because the present professional staff has the knowledge, enthusiasm and desire to carry out the Plan.

I strongly support and urge the adoption of this proposed Management Plan for the Thunder Bay Sanctuary.

Demmis R Bodem